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UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
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UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

Samuel Pierce, Plaintiff,

Docket Number:

v.

Marie Gavigan

Civil 23-00359-JMS-RT
Complaint

State of Hawaii,

John Does No. 1-100, Defendants.

I, Samuel Pierce, complain as follows:

A. Parties

The parties are Samuel Pierce, Plaintiff, and Marie Gavigan and John Does 1-100 associated with state government in Hawaii.

B. Jurisdiction

The Court has federal question jurisdiction as well as diversity and supplemental jurisdiction.

C. Venue

Venue is proper in this district because the Defendants can be found here and a substantial portion of the events giving rise to the case occurred here.

D. Facts

The facts of the case are familiar to the Court, have been described in 21-cv-351, all of which is incorporated herein by reference, and are briefly summarized here below.

Approx 2014-2018 - Gov. David Ige strikes up a relationship with the owners of TMI Associates, a large law firm in Japan, which the owners later told me was to essentially a scheme to at the very least leverage the state's money for his personal benefit in a series of representations of State and him personally rife with conflicts of interest.

2020- I start working at TMI associates as a US patent attorney for Japanese clients, a very desirable position in which I was the head of foreign IP and did not have to report to any other US lawyers.

July 2021- My wife and I are highly aggravated because we have to travel 4 hours twice to go to a specific clinic in Japan contracted with David Ige/Hawaii in order to meet the entry requirements for Hawaii.

On or about August 20, 2021- I very politely ask the State not to make me go through the process I went through in July particularly since the state was now exempting vaccinated travelers from quarantine. The State refuses, and I file a federal lawsuit assigned to Hon. J. Michael Seabright, along with a request for a temporary restraining order. Hon. J. Michael Seabright's careful consideration of the absurdity of courtesy copies under the circumstances irks the State and sets the State on an intimidation campaign to ruin my life which wildly succeeds beyond all imagination.

On or about September 1, 2021 - The State goes to great lengths to dig up any dirt it can on me to use to intimidate me from exercising my First Amendment rights. It finds out ironically I work for the large law firm used by the State and David Ige personally. It unearths a 2008 blackjack card counting incident in Connecticut. It tells me I am licensed as a lawyer in Maine and makes the most demonstrably extortionate threat of license revocation imaginable. Then it sends an email to Yoshiyuki Inaba one of the owners of TMI Associates at yinaba@tmi.gr.jp telling TMI inaccurately that I was arrested in the 2008 incident and further misrepresents other civil rights cases in which I was a party, all in the effort to leverage the State's and David Ige's personal business to get TMI to fire me.

September 2021 - TMI confronts me and tells me it got the email described above from the state. Yoshiyuki Inaba who was a mentor to me apologizes that he has to fire me because he says he is making huge money from David Ige / the State which is demanding my termination in retaliation for filing the lawsuit over the COVID emergency power excesses. The temporary restraining order is mooted because I lost my job and no longer wanted to travel to Hawaii.

March 2022 – Hon. J. Michael Seabright rules the amended complaint (incorporated herein by reference) at first glance states a federal retaliation cause of action, closes the original case and opens a new case which I voluntarily dismiss without prejudice to the current refiling.

E. Causes of Action

42 USC 1983 / First Amendment

The above facts as well as the entire amended complaint filed in 21-cv-351 are herein incorporated by reference. As the Hon. J. Michael Seabright ruled, the facts give rise to literally the most obvious federal constitutional rights violation conceivable.

Respectfully Submitted,
/Samuel Pierce/
August 28, 2023
Plaintiff Pro Se